

SERVICE OF RESPONSE
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BANKRUPTCY CASE No. 1-300088
CHAPTER 11

PG&E CORPORATION and PACIFIC GAS AND ELECTRIC COMPANY, Debtors

*Affects both Debtors

REGARDING NOTICE OF THE REORGANIZED DEBTORS FOR THIRD OMNIBUS CLAIMS

VS

WILLIE AND ORA GREEN, Creditors

Claim No. 80673

2845 Magnolia Street

Oakland CA 94608

510 893-4251

org53@gmail.com

We respectfully petition the court for motion to request PG&E to settle claim presented for property damages to owners, at a fair and reasonable amount within a timely manner, not to allow claim to continue indefinitely without settlement.

QUESTION PRESENTED

1. PG&E SEEKS TO DISALLOW OR EXPUNGE CLAIMS PRESENTED BY PROPERTY OWNERS/ CREDITOR FOR DAMAGE OF PROPERTY.

WE OPPOSE

1. PG&E DISALLOWANCE AND EXPUNGE TO AVOID RESPONSIBILITY FOR DAMAGE CAUSED BY PG&E WORKERS TO THE PROPERTY LOCATED AT 2845 MAGNOLIA STREET OAKLAND CA DRIVEWAY AND GARAGE FLOOR.

WE OPPOSE

2. PG&E REFUSAL TO COMPENSATE OWNERS IN A FAIR AND REASONABLE AMOUNT ON CLAIM TO SETTLE FOR PROPERTY DAMAGES EVEN WHEN OWNER REPORTED DAMAGES TO PG&E.

WE OPPOSE

3. PG&E REFUSAL TO SETTLE CLAIM IN A TIMELY MANNER THUS LENGTHENED RESPONSE TIME TO RESOLVE ISSUE REGARDING COMPENSATION FOR DAMAGES TO PROPERTY EVEN THOUGH PG&E WAS AWARE OF DAMAGE TO PROPERTY AND CLAIMS WERE PRESENTED ALONG WITH ESTIMATES ON COST TO FIX DAMAGE.

We declare under penalty of law that the knowledge and facts of this case evidence supporting of all events are given to support the response are truthful and to best of our knowledge as being present when they occurred

Continued Response:

October 19, 2021 at 10:00 a.m.

via Tele/Video conferencing appearance only

Willie and Ora Green 2845 Magnolia Street Oakland CA 94608

Claim# 19-30088

510 893-4251

org53@gmail.com

Small Residential Income Property Appraisal Report

The purpose of this summary appraisal report is to provide the lender/client with an accurate, and adequately supported, opinion of the market value of the subject property.

Property Address 2845 MAGNOLIA STREET City EMERYVILLE State CA Zip Code 94608-4445

Borrower WILLIE GREEN Owner of Public Record GREEN, WILLIE County Alameda

Legal Description BK. 23 Pg 72

Assessor's Parcel No. APN# 005-0458-014-01 Tax Year 2013 R.E. Taxes \$ 4,101.46

Neighborhood Name Oakland/Emeryville Map Reference 649/F1 Census Tract 4015.00

Occupant ☒ Owner ☐ Tenant ☐ Vacant Special Assessments \$ None PUD HOA \$ N/A per year per month

Property Rights Appraised ☒ Fee Simple ☐ Leasehold ☐ Other (describe)

Assignment Type ☐ Purchase Transaction ☒ Refinance Transaction ☐ Other (describe)

Lender/Client First Bank Mortgage Address 1 First Missouri Center St Louis, MO, 63141

Is the subject property currently offered for sale or has it been offered for sale in the twelve months prior to the effective date of this appraisal? ☐ Yes ☒ No

Report data source(s) used, offerings price(s), and date(s). EBRDMLS

I ☐ did ☐ did not analyze the contract for sale for the subject purchase transaction. Explain the results of the analysis of the contract for sale or why the analysis was not performed.

Contract Price \$ Date of Contract Is the property seller the owner of public record? ☐ Yes ☐ No Data Source(s)

Is there any financial assistance (loan charges, sale concessions, gift or down payment assistance, etc.) to be paid by any party on behalf of the borrower? ☐ Yes ☐ No

If Yes, report the total dollar amount and describe the items to be paid.

NEIGHBORHOOD

Note: Race and the racial composition of the neighborhood are not appraisal factors.

Neighborhood Characteristics				2-4 Unit Housing Trends				2-4 Unit Housing		Present Land Use %		
Location	<input checked="" type="checkbox"/> Urban	<input type="checkbox"/> Suburban	<input type="checkbox"/> Rural	Property Values	<input checked="" type="checkbox"/> Increasing	<input type="checkbox"/> Stable	<input type="checkbox"/> Declining	PRICE	AGE	One-Unit	85 %	
Built-Up	<input checked="" type="checkbox"/> Over 75%	<input type="checkbox"/> 25-75%	<input type="checkbox"/> Under 25%	Demand/Supply	<input checked="" type="checkbox"/> Shortage	<input type="checkbox"/> In Balance	<input type="checkbox"/> Over Supply	\$ (000)	(yrs)	2-4 Unit	10 %	
Growth	<input checked="" type="checkbox"/> Rapid	<input type="checkbox"/> Stable	<input type="checkbox"/> Slow	Marketing Time	<input checked="" type="checkbox"/> Under 3 mths	<input type="checkbox"/> 3-6 mths	<input type="checkbox"/> Over 6 mths	525	Low	32	Multi-Family	0 %
Neighborhood Boundaries The subject neighborhood is bounded by Alcatraz Ave. to the North, FRWY 880 to the South, FRWY 880 to the West and FRWY 580 to the East.								830	High	121	Commercial	0 %
Neighborhood Description This section of Oakland is primarily a residential community from average to good homes. Higher levels of maintenance were noted at the time of inspection. The commercial properties are retail establishments that provide supporting services. Highly regarded for the schools, and major shopping are nearby as are other supporting services. Employment Centers in the are 5 to 10 minutes distant via public transportation.								610	Pred.	110	Other Vacant	5 %
BART local roads, Interstate 580, and 880. Due to lack of rental units in subject market area rent are on the high demand.												
Market Conditions (including support for the above conclusions) See Comment Addendum.												

SITE

Dimensions 54.5x96.6 Area 5,265 SqFt Shape Rectangular View City View

Specific Zoning Classification R-30 Zoning Description Single Family Residential

Zoning Compliance ☒ Legal ☐ Legal Nonconforming (Grandfathered Use) ☐ No Zoning ☐ Illegal (describe)

Is the highest and best use of subject property as improved (or as proposed per plans and specifications) the present use? ☒ Yes ☐ No If No, describe.

Utilities Public Other (describe) Public Other (describe) Off-site Improvements--Type Public Private

Electricity ☒ Water ☒ Street Asphalt ☒

Gas ☒ Sanitary Sewer ☒ Alley None ☒

FEMA Special Flood Hazard Area ☐ Yes ☒ No FEMA Flood Zone X FEMA Map # 06001C0058G FEMA Map Date 08/03/2009

Are the utilities and off-site improvements typical for the market area? ☒ Yes ☐ No If No, describe.

Are there any adverse site conditions or external factors (easements, encroachments, environmental conditions, land uses, etc.)? ☐ Yes ☒ No If Yes, describe.

No adverse easements or encroachments noted at the time of inspection. Normal utility easements are assumed.

IMPROVEMENTS

General Description				Foundation		Exterior Description materials/condition		Interior materials/condition	
Units	<input checked="" type="checkbox"/> Two	<input type="checkbox"/> Three	<input type="checkbox"/> Four	<input type="checkbox"/> Concrete Slab	<input checked="" type="checkbox"/> Crawl Space	Foundation Walls	Concrete/Good	Floors	Hrdw/Carp/Good
Accessory Unit (describe below)				<input type="checkbox"/> Full Basement	<input type="checkbox"/> Partial Basement	Exterior Walls	Wood/Good	Walls	Drywall/Average
# of Stories	1	# of bldgs.	2	Basement Area	0	Roof Surface	Comp. Shingle/Average	Trim/Finish	Paint/Wood/Avg
Type	<input checked="" type="checkbox"/> Det.	<input type="checkbox"/> Att.	<input type="checkbox"/> S-Det./End Unit	Basement Finish	%	Gutters & Downspouts	Aluminum/Good	Bath Floor	Vinyl/Avg
<input checked="" type="checkbox"/> Existing	<input type="checkbox"/> Proposed	<input type="checkbox"/> Under Const.	<input type="checkbox"/> Outside Entry/Exit	Sump Pump		Window Type	Dbl-hung/Good	Bath Wainscot	Ceramic/Average
Design (Style)	Bungalow	Evidence of	Infestation None	Term Sash/Insulated	Yes/Avg	Car Storage			
Year Built	1982	Dampness	Settlement	Screens	Yes/Avg	Car Storage	None		
Effective Age (Yrs)	10	Heating/Cooling		Amenities		<input checked="" type="checkbox"/> Driveway	# of Cars	2	
Attic	<input type="checkbox"/> None	FWA	<input checked="" type="checkbox"/> HWBB	Radiant	Fireplace(s) #	None	Woodstove(s) #	0	Driveway Surface
Drop Stair	<input type="checkbox"/> Stairs	Other	Fuel Gas		Patio/Deck	x	Fence Wire	x	Garage
Floor	<input checked="" type="checkbox"/> Scuttle	Cooling	<input checked="" type="checkbox"/> Central Air Conditioning		Pool	None	Porch	Wood	Carport
Finished	<input type="checkbox"/> Heated	Individual	Other None		Other None				# of Cars
# of Appliances	Refrigerator x	Range/Oven x	Dishwasher	Disposal	Microwave	Washer/Dryer	x	Other (describe)	
Unit #1 contains:	6 Rooms	3 Bedroom(s)	2.00 Bath(s)	1,377	Square feet of Gross Living Area				
Unit #2 contains:	5 Rooms	2 Bedroom(s)	1.00 Bath(s)	848	Square feet of Gross Living Area				
Unit #3 contains:	Rooms	Bedroom(s)	Bath(s)		Square feet of Gross Living Area				
Unit #4 contains:	Rooms	Bedroom(s)	Bath(s)		Square feet of Gross Living Area				
Additional features (special energy efficient items, etc.) See comment									

Describe the condition of the property (including needed repairs, deterioration, renovations, remodeling, etc.). Both of the units were owner occupied at the time of inspection per owner. All unit were recently modernized as needed and all utilities are in good working order at the time of inspection. All utilities were reported to be on and mechanical systems were working properly including safety release latches, electrical, and plumbing at the time of inspection. No observable or otherwise known negative condition exist which would impact the subject.

Instructions: Responding to a Motion to Dismiss the Complaint

This template was prepared by the Justice & Diversity Center, a nonprofit organization, and is not an official court form. It can be used in certain civil lawsuits in the Northern District Court of California. *Using this template does not guarantee any result in your case.*



HOW TO GET LEGAL INFORMATION AND ADVICE

This packet provides general guidance about opposing a motion to dismiss. *Before filing this document*, make an appointment for free legal information and advice at one of the Legal Help Centers.



If the case is assigned to a judge in the San Francisco, Oakland, or Eureka federal courthouse, do one of the following:



Call the appointment scheduling line for the Federal Pro Bono Project: 415-782-8982



Sign up in the appointment book at either:

450 Golden Gate Ave., 15th Floor, Room 2796, San Francisco or
1301 Clay Street, 4th Floor, Room 470S, Oakland



Email us at federalprobonoproject@sfbbar.org

This email is to schedule appointments only-no legal advice is given over email.



If the case is assigned to a judge in the San Jose federal courthouse, do one of the following:



Call the appointment scheduling line for the Federal Pro Se Program: 408-297-1480



Monday to Thursday 9:00 am - 12:00 pm, drop in at

The Law Foundation of Silicon Valley, 152 North 3rd St., 3rd Floor, San Jose

Monday to Thursday 1:00 pm - 4:00 pm, drop in at

280 South 1st Street, 2nd Floor, Room 2070, San Jose



WHEN TO RESPOND TO A MOTION

You have only 14 days to respond to a motion. ⚠ The time to respond runs from the date the motion was filed. Check the certificate of service, which should be attached to or included with the Motion papers.



DECIDE HOW TO RESPOND TO THE MOTION

If you have not already filed an amended complaint, and you think you can fix the problems the Defendant identified in the Motion to Dismiss, you may be able to file an Amended Complaint instead of an Opposition. Make an appointment at the Legal Help Center (see page 1) for advice. The deadline for filing an Amended Complaint is the same as the deadline for filing an Opposition.



HOW TO COMPLETE THIS OPPOSITION TO MOTION TO DISMISS TEMPLATE

- ☐ **Fill in the case information.** Fill in all blanks on the first page. The date and time for the motion hearing can be found on the Defendant's Motion.
- ☐ **Write in the facts.** Write a short version of the facts you wrote in the Complaint. If there are facts that you did not include in the Complaint, but might make a difference in whether the Court dismisses your Complaint or not, add them here.
- ☐ **Respond to each of the Defendant's arguments.** A defendant usually makes several points in the "Argument" section of its Motion to Dismiss. You should respond to each point. Most Memoranda cannot be longer than 15 pages (excluding title page). If you have questions about the arguments or how to respond to them, or are concerned about going over the page limit, contact the Legal Help Center (see page 1).
- ☐ **Add required pages.** If your Opposition is longer than 10 pages (excluding title page), you must include a table of contents and table of authorities; these should be inserted immediately after the title page. If the judge in your case requires it, you may need to submit a proposed order. Review the judge's Standing Order and Scheduling Orders: <http://www.cand.uscourts.gov/judges>.
- ☐ **Review, number the pages, and sign.** Read the entire document to make sure it is clear, correct and complete. Fill in the page numbers and the total on each page. Sign and date.
- ☐ **Prepare the Certificate of Service.** Each document that you file must be "served" on each other party, usually by sending it in the mail. Follow the instructions on the Certificate of Service.
- ☐ **Mark your calendar.** Put the hearing date on your calendar, and be sure to show up at Court. *You must follow whatever decision is made at or after the hearing and any instructions from the Court.*



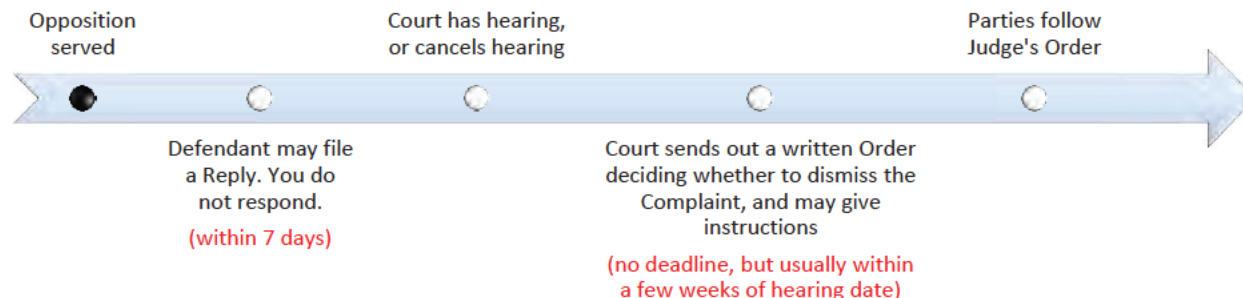
FILING AND SERVING YOUR OPPOSITION PAPERS

1. **Make copies.** Once the documents are complete, make three copies of each. On one copy of the documents, write "Chambers" on the top in pen. If there is more than one plaintiff or defendant, you will also need one copy for each of them.
2. **File the Opposition.** Deliver or mail the *original plus two copies* of the Opposition and the Certificate to the Clerk's Office at the courthouse where the Judge for your case is located. The Clerk will take the original and one copy. The other copy is for you to keep after it is stamped by the Clerk. If you file by mail, include a self-addressed, stamped envelope so that the Clerk can send a copy back to you.
3. **Serve the Opposition.** Be sure the Opposition and Certificate are served on each party.



TIMELINE: AFTER OPPOSITION PAPERS ARE FILED

The timeline below lists what generally happens after the Opposition is filed. The Legal Help Centers (see page 1) can provide guidance about these steps, and have many other templates for you to use in your case.



STAY UP TO DATE

1. **Update your contact information.** File a notice with the Clerk right away if your address, email, or phone number changes, or you may miss important deadlines, causing you to lose your case.
2. **Check your mail.** Be sure to check regularly for documents from the Court and opposing side.
3. A list of all of the documents that have been filed, and (usually) the documents themselves can be viewed online. See Chapter 7 of the Handbook for Pro Se Litigants (see below), and contact the Legal Help Center for information about how to access the documents (see page 1).



UNDERSTANDING THE LAWS AND RULES

The Legal Help Centers (see page 1) are the best resource for people without lawyers. There are other resources for understanding the laws and rules of the Court:

1. **Handbook for Pro Se Litigants.** The Handbook is a procedural guide for people who are representing themselves. It was prepared by the Court and is available at the Clerk's Office or on the Court's website at www.cand.uscourts.gov/prosehandbk.
2. **Legal Research Guide for Pro Se Litigants.** The Guide provides information for people who are representing themselves about how to do legal research, like finding statutes and decisions in other cases. It was prepared by the Justice & Diversity Center and is available at the Legal Help Centers and at www.cand.uscourts.gov/Legal-Help-Center-Templates.
3. **Federal Rules of Civil Procedure.** These Rules explain the procedures from filing through trial for all civil cases in the federal courts across the country, and are available at www.uscourts.gov/sites/default/files/rules-of-civil-procedure.pdf.
4. **Local Rules.** The Local Rules follow the same numbering as the Federal Rules of Civil Procedure, but generally provide more detail. They apply in this District only, and are available at www.cand.uscourts.gov/localrules/civil.

1 Your name: Willie & Ora Green
2 Address: 2845 Magnolia Street
3 Oakland CA 94608
4 Phone Number: 510 893-4251
5 E-mail Address: orgr53@gmail.com
6 Pro se

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 Division [check one]: ☒ San Francisco ☐ Oakland ☐ San Jose ☐ Eureka

12 <u>WILLIE & ORA GREEN</u>)	Case Number: <u>19-30088</u>
13 <u>Creditors</u>)	
14 <u>Plaintiff,</u>)	OPPOSITION TO MOTION TO DISMISS
15 <u>vs.</u>)	
16 <u>PG&E CORPORATION</u>)	DATE: <u>10/14/2021</u>
17 <u>PACIFIC GAS AND ELECTRIC</u>)	TIME: <u>10:00</u>
18 <u>Debtors</u>)	JUDGE: Hon. <u>Dennis Montali</u>
19 <u></u>)	
20 <u></u>)	
21 <u>Defendant.</u>)	

1 **FACTUAL BACKGROUND**

2 *[Write a short version of the facts in the Complaint. After each fact, write in the paragraph number of*
3 *the Complaint where that information can be found.]*

4 During the PG&E mandated gas line replacement in Oakland CA in 2016 - 2017 . PG&E started
5 very heavy intense construction in our street. During that construction program PG&E staged daily
6 heavy equipment in front of the gates of my house causing very heavy intense sound and vibrations.
7 I had to close my gates because they were turning around on my driveway at 2845 Magnolia Street
8 See Exhibit #A shows heavy equipment and staging in front of house and steam roller using
9 driveway to turnaround and cracks running from the street onto our driveway to go under the
10 garage door cracking the garage floor. PG&E then cut a 3 x 5 hole in my driveway without
11 notification to the owners who were home, the cars were in the driveway at that time. The workers
12 removed the steel rebar and stabilizing filling and covered the 3 x5 hole with blacktop. We saw
13 this when we came out of the house later, but we no one spoke to us before or during the work
14 being done. PG&E own notice to home owners state owners are to be notified before this type or
15 alterations are make to property. I called PG&E about the 3 x 5 hole being cut and the cracks
16 in the driveway and the garage floor after I spoke to one of the workers on the site who said call
17 PG&E. I called, did a claim on line and PG&E sent a worker not a investigator to look at the
18 damage. He said they didn't do it and walked out. I didn't hear from PG&E. Exhibit # B PG&E
19 notice to property owners regarding work, notification regarding claim. Later a representative called,
20 questioned and verified with me about what had happened, then she worked on the claim.
21 PG&E never sent a representative to conduct a proper investigation and to actually see what had
22 happened. I proceeded to get quotes and a investigative report from a structural engineer because
23 of the cracks running up to the house in the garage and in the house which was presented to PG&E.
24 Years later PG&E offered \$500- \$1500 to settle. The estimates are for more. I offered to lower
25 the amount and PG&E refused in written settlement and at a Zoom mediation meeting. It was made
26 known PG&E refuses to acknowledge damage to driveway and garage floor or settle for a fair amount
27 Meeting ended in a stalemate.
28

OPPOSITION TO MOTION TO DISMISS

CASE NO.: 19-30088

; PAGE 2 OF 4 [JDC TEMPLATE – rev. 2017]

1 **ARGUMENT**

2 *[Explain your response to each of Defendant's arguments. Go in the same order as the arguments*
3 *were made in Defendant's Motion, if possible.]*

4 Willie and Ora Green are the owners of the property that PG&E workers entered on to preform
5 gas line replacement, alterations to property was done with out knowledge or permission of the
6 property owners, the Greens. We have only been make aware of Ms. Jensen as the investigaton after
7 years of this issue regarding the damage because we were never contacted by anyone from PG&E
8 except for the two gas line workers to look into this situation. PG&E only contacted us regarding
9 possible damage to our sewer lines resulting from the gas line replacement in 11/2021.

10 #5 Ms Jensen claims that after PG&E workers first came on the property and cut a 3x5 hole in the
11 driveway without notification to the owners with a car in the driveway and children present. The
12 unidentified man was told to leave and get his supervisor, to speak to the property owners about wha
13 they were going to do this time to the driveway. As the owner I believe I have the right to know.
14 PG&E never contacted the property owners to address the damage they caused to the driveway
15 or garage floor. Even under Rule 16 PG&E does not have the right to come onto property with out
16 notifying the owners to do work beyond the scope of their routine or emergency duties or to alter or
17 cause damage to property of their customers. Ms Jensen was made aware that driveway was not
18 the original one it had been replaced with one that was thicker, reinforced steelbar and gravel for a
19 up graded protection. And my house was also on the market to sell before the damage to the drivewa
20 and garage floor. Ms Jensen reply my house is old and all garage driveways and gargage floors
21 crack hers did, comparing her situation with ours. The only problem is PG&E cracked our driveway
22 causing the cracking of the garage floor. I was also told anyone can get a structural report, but
23 PG&E didn't take the effort at the time the damage occured.

24 #7 At no time were the owners notified by phone or by mail that ARB was to make repairs. No
25 contacted the home owners period. That included PG&E regarding ARB.

26 #8 During the Zoom mediation Ms Jensen was not aware of many facts of the case and was not able
27 answer or give a reasons for what had taken place by PG&E and ARB workers.

28 #8 I presented her and PG&E with several pictures of the front of the house showing the driveway,

OPPOSITION TO MOTION TO DISMISS

CASE NO.: 19-30088

; PAGE 3 OF 4

[JDC TEMPLATE – rev. 2017]

1 the black top 3x5 patch, the heavy constuction equiptment staging in front of the house, the steam
2 roller backing up into the driveway, as well as structual engineer reports show how structural
3 weight failure causes cracking of concrete because of vibration of heavy equiptment being used
4 on or too close to causing damage.

5
6 We had home inspections, which commented on the condition in 2014 and 2015 of our property,
7 none the inspections mentions cracks in the driveway or garage floor at the time with items needing
8 attention or repairs for preperation for business purposes.

9
10
11 #9 and #10 Ms Jensen presents the pictures of the front of 2845 Magnolia Street, which I sent to her :
12 and to PG&E several times, the pictures I sent had cracks from the work caused during the time
13 PG&E gas line program was working on Magnolia Street. Earlier pictures I viewed did not show
14 the cracks.

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21
22
23
24 *[If this document is longer than ten pages, you must include a table of contents and a table of authorities.]*

25 *[You must sign and date.]*

26
27 Date: 10/14/2021 Sign Name: _____

28 Print Name: Willie and Ora Green

OPPOSITION TO MOTION TO DISMISS

CASE NO.: 19-30088

; PAGE 4 OF 4 [JDC TEMPLATE – rev. 2017]

1 *Insert this page as needed to continue the facts or argument section, or to write an introduction.*

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OPPOSITION TO MOTION TO DISMISS

CASE NO.: 19-30088 ; PAGE 4 OF 4 [JDC TEMPLATE – rev. 2017]

Case: 19-30088 Doc# 11429 Filed: 10/14/21 Entered: 10/15/21 10:21:47 Page 10
of 13

CERTIFICATE OF SERVICE OF DOCUMENT OTHER THAN COMPLAINT

** You must serve each document you file by sending or delivering to the opposing side. Complete this form, and include it with the document that you file and serve.**

1. **Case Name:** WILLIE & ORA GREEN v. PG&E CORPORATION

2. **Case Number:** 19-30088

3. **What documents were served?**

Opposition to Motion to Dismiss

4. **How was the document served?** *[check one]*

☐ Placed in U.S. Mail

☐ Hand-delivered

☐ Sent for delivery (e.g., FedEx, UPS)

☒ Sent by fax (if the other party has agreed to accept service by fax)

5. **Who did you send the document to?** *[Write the full name and contact information for each person you sent the document.]*

US Court

Prime Clerk

KELLER BENVENUTTI KIM LLP

6. **When were the documents sent?** 10/14/2021

7. **Who served the documents?** *[Whoever puts it into the mail, faxes, delivers or sends for delivery should sign, and print their name and address. You can do this yourself.]*

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Signature: _____

Name: Willie Green

Address: 2845 Magnolia Street

Oakland CA 94608

CERTIFICATE OF SERVICE *[JDC TEMPLATE Rev. 05/2017]*



O Green <ogr53@gmail.com>

driveway replacement/garage floor cracks

alan.gurd@ergeon.com <support@ergeon.com>

Sat, Aug 14, 2021 at 7:21 AM

Reply-To: support@ergeon.com

To: Willie and Ora Green <ogr53@gmail.com>

Good morning Ora, I hope you and Willie are well.

So, apologies for the amount of time it took me to get to this. It has been a very busy period.

In answer to your points.

1. **Total Driveway replacement** - This, in my opinion is the best solution for a number of reasons. Firstly you will achieve a consistent and uniform appearance if everything is the same color. As no 2 x batches of concrete are the same in color.
2. **Quote for replacing 1 of the 4 sections** - we would not be able to provide a quote for this as it would be below our minimum order value/rate, as a large company, we would likely be uneconomical for you.
3. **Repairing the 3 x 5 section** - again, this is below our project minum, and secondly it would look out of place to have a different color slab put in place, as once it dries it will not have the uniform appearance that is normal for driveways, being somewhat like a patchwork quilt.
4. **Replacing the garage floor** - in our opinion this is the best solution as the cracks seem to be of significant enough size to indicate a possible structural failure beneath. As garages are covered areas, they are subject to humidity levels much more than outdoor areas and as such should be in a higher spec concrete along with a vapor barrier, this protects the integrity of the curing concrete and ensures longevity.
5. **Repairing the cracks** - this is not something we would offer or advise. It is poor way to handle the damage and likely only a temporary fix.

I hope these comments/notes are of some help. If you have any other questions or concerns, please reach out to me.
kind regards

—
Alan Gurd

Ergeon Fence and Driveways

650-300-4854



Ex 1+2
19-30088

\$8,264



A Area A

Driveway - 594 sq ft

Area: 594 sq.ft.

- Demo, Excavation and Haul-Away
- Concrete cutting
- Base Material - 2 Inches of Class II Recycled Base Rock
- Rebar - #3 Rebar 18" OC
- Concrete Installation - 4 Inches of 3500 PSI Concrete
- Broom Finish



B Area B

\$9,870

Garage - 498 sq ft

Area: 498 sq.ft.

- Demo, Excavation and Haul Away
- Base Material - 4 Inches of Class II Recycled Base Rock
- 10 mil Stego Vapor Barrier
- Rebar - #4 Rebar 16" OC
- Concrete Installation - 5 Inches of 3500 PSI Concrete
- Broom Finish

Total: \$18,134*

* - An additional 2% fee will be added for credit/debit cards